Jane Cottrell
Forest Supervisor
Nez Perce National Forest
1005 Highway 13 Grangeville, ID 83530

September 2, 2005

RE: Idaho Conservation League and The Wilderness Society comments on the Red Pines Project Final Environmental Impact Statement

Dear Jane:

Thank you for allowing us to comment on the FEIS for the Red Pines Project. The Idaho Conservation League (ICL) and The Wilderness Society (TWS) have a long history of involvement with forest management issues around the state, and specifically in the Nez Perce National Forest. ICL and TWS staff members have visited the project area on numerous occasions individually, as well as with USFS staff, have tracked the project since its inception, and are familiar with the project.

As Idaho's largest state-based conservation organization, the ICL represents over 3,300 members, many of whom have a deep personal interest in protecting our air, water, wildlands, and wildlife from the harmful effects of logging in inappropriate areas.

TWS has long been involved in the management of Idaho's national forests, including the Nez Perce National Forest. TWS seeks to insure that natural resource management decisions are based on sound science and that the ecological integrity of the public lands is preserved.

As we stated in our comments on the DEIS, which we incorporate by reference in full, we believe that the large amount of road construction and logging proposed are completely inappropriate given the degraded condition of this drainage, especially with the high potential for fisheries and wildlife habitat in the area. With over 30,915 acres having been logged in the past, the addition of a minimum of 3,464 acres of logging, a more than 10% increase, is unacceptable.

Forest Service Response

Response 4-1. Comments by reference.
Comments to DEIS comments have been responded to in the FEIS, Chapter IV, in Section 4.5.

The Selected Alternative E has proposed restoration projects and mitigations designed to offset potential damage from logging and result in an upward trend in aquatic habitat carrying capacity in the affected watersheds .See ROD Section 1.5.

Significant new road construction, even temporary, is also not a viable option given the Forest Service's own scientific evidence showing the road system's effect on terrestrial species and listed fish species in this watershed. The activities described do little to protect homes and communities from fire in any meaningful way, and may in fact exacerbate fire danger, severity and intensity. If logging were the answer, the Red River drainage would be one of the safest places on earth.

As you note in the FEIS, many of the streams in the project area are failing to meet criteria and standards established in the Forest Plan, Biological Opinions, P ACFISH amendments, and the South Fork Clearwater River Total Maximum Daily Loads (TMDL). These criteria include, but are not limited to Cobble Embeddedness, Pool:Riffle Ratios, Large Woody Debris, Percent Surface Fines, Sediment Loads, and Stream Shade. Further, where any data exists to determine the attainment of these criteria, much is outdated and stale. It is imperative that a positive upward

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trend be identified (through statistically significant means) prior to any activities taking place. Further, continuance of this upward trend must be indicated through on-the-ground monitoring in order to proceed with Red Pines project activities.

Response 4-2. New temporary roads, structure protection.
This project is designed to reduce fuel loadings at strategic locations and is not specifically designed to accomplish defensible space around structures. That has already occurred under the Red River Defensible Space Project. This project is not contrary to the Forest Plan because: resource values do not only refer to the wildland urban interface, but also refers to timber, air quality, habitat, recreation opportunities. The proposed treatments would modify fire behavior by lowering fire intensities for fires occurring in the treatment areas. This would give suppression resources the opportunity to utilize those areas during suppression activities, facilitating the control of a fire at a smaller size and less cost.

The areas available for prescribed treatment activities that are accessible from existing roads are insufficient in size and location to satisfy the projects Purpose and Need. The fuels reduction portion of the project is focused primarily on removing dead, down and dying lodgepole pine, which must be removed in quantities and at locations sufficient to create the fuel breaks necessary to achieve the project objectives.

It is acknowledged that the short-term risk of a high severity intensity wildfire is possible between the time of the vegetation treatment and the slash disposal is completed. The long term benefits of the treatments, modified fire behavior and lower future fuel loadings, outweigh the short-term risk. Additionally, after the slash disposal is completed the fuel loadings in the treatment areas will be less than 12 tons per acre. If the treatments are not accomplished and stands continue to transition to Fuel Models 10 and 13 we would see fuel loadings far in excess of 12 tons per acre.

Response 4-3. TMDL, BO, Upward trend, Data.
Within the terms and conditions of the Biological Opinions received from the US. Fish and Wildlife Service and NOAA-Fisheries on this project, the timing of implementation of the restoration activities will be planned and implemented concurrently or before the fuel reduction treatments (ROD Appendix B-Biological Opinions). Additional on-the-ground monitoring is also required.

In a letter dated June 8, 2005, the IDEQ concluded that Alternative E "appears to be consistent with the intent of the South Fork Clearwater River TMDL" (ROD, Appendix C: FEIS Comment Letter #1 from IDEQ; FEIS Comment Letter #2 from the EPA, FEIS Comment Letter #6, Response #6-4).

Data regarding the analysis of upward trend is presented in the FEIS Appendix H..

As with any restoration activity, a positive trend based on statistically significant means will take time. Removal of roads through decommissioning is an effective restoration method that will have direct benefits to stream conditions with the removal of culverts/log bridges and the location of roads in riparian areas.

There are tremendous opportunities for restoration projects in this area that could reduce sediment loads, provide logs for local mills, and reduce the future risk and severity of fires. While we appreciate the development and analysis of Alternative E, we do not feel that the selection of this alternative will result in the needed improvements in the drainage. We appreciate the efforts to decommission up to 104 miles of roads, but these efforts need to be expanded significantly and guaranteed throughout the watershed. As we have pointed out in previous comments, we strongly feel that any project needs to be based off of existing road systems, close additional roads, and be located within the wildland urban interface in order to meet the purpose and need, as well as the direction of Forest Plan, and other guidance.

Response 4-4. Restoration amount, treatment location , existing road system.
See Response 6-5 regarding more road decommissioning.
See Response 4-2 regarding using the existing road system for treatment activities..
See Response 4-2 and the FEIS, Chapter IV, Responses 14-50, 14-51 relative to treatment within the WUI.

Finally, as stated in prior comments, we have strong objections to the proposed Forest Plan Amendments and urge you to abandon these effo,rts and instead proceed with a project that complies with existing direction in the Forest Plan. With a revised Forest Plan in development, it is inappropriate to proceed with significant amendments that would have detrimental impacts on forest, water, soil, wildlife and fishery resources.

Please send our organization copies of any subsequent NEP A documentation. Feel free to contact either of us if you have any questions about these comments.

Sincerely,

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Response 4-5. Amendments.
See ROD, Section 1.3 and 1.4 for the .Decision and Rationale.
See ROD Sections 1.3.5 and 1.8.12.1.In Appendix D of the ROD is the final language for the site-specific the Forest Plan Amendments (3) related to fishery/water quality objectives. Alternative E requires the fewest amount of amendments compared between alternatives. One amendment will allow management activities to take place in the short term while achieving and long term improvement in aquatic conditions. One amendment adds omitted information regarding stream information not available with the original Forest Plan in 1987. One amendment will allow a one-time exceedance to a stream that currently exceeds the sediment yield guidelines and allow activities to be implemented.

Idaho Conservation League and The Wilderness Society comments on the Red Pines Final Environmental Impact Statement

Incorporation of DEIS Comments
By reference, we incorporate comments submitted in response to the Draft EIS in October, 2004. Because we continue to feel that many of the issues addressed in our prior comments have not been adequately addressed, we incorporate them here by reference.

Forest Plan Amendments
We continue to oppose efforts to weaken standards and allow for additional impacts to water and soil quality in association with this project. We are particularly concerned with the amendment to suspend the Upward Trend requirement (Amendment 4). We are also concerned that the Soil Amendment and Water Quality Amendment 1 will apply to future projects in the area. Given the substantial alteration to natural soil and hydrologic systems in the project area, application of these amendments to future projects that would result in additional impacts is inappropriate. Instead, these amendments, if implemented, should
apply only to this project.

Old Growth
In addition to the exclusion of logging activities in Forest Plan Old Growth, we encourage you to avoid any logging in areas that meet the North Idaho Old Growth Definitions (Green et al). We continue to question the assertion that the project area meets Forest Plan direction for minimum Old Growth requirements.

Water Quality
Decommissioning roads should be the top priority for the Forest and especially in the Red River drainage with an overall road density of 3.6 mi/mi2 (FEIS, 3-56). It is unacceptable that road construction is proposed in an area that is already heavily roaded, and where water quality has been significantly degraded because of excessive road densities. The FEIS, Red River EA WS, and the South Fork Landscape Assessment and other documents, consistently highlight the problem of excessive roads, their impacts on

water quality, wildlife and other resources. On page III-55, the FEIS notes, "The density and distribution of roads within the subwatersheds indicate there is a high probability that the current hydrologic regime is substantially altered." Given this, it is inappropriate to construct new roads, event temporary ones.

Response 4-6. Comments.
Comments to DEIS comments have been responded to in the FEIS, Chapter IV, Section 4.5.

Response 4-7. Amendments.
See also Response 4-5.
Alternative E was developed so that upward trend requirements would not be suspended in any watershed in the project area. The soil amendment would apply only to the Red Pines project area and only until the Forest Plan is revised, currently scheduled for 2007. Water quality amendment 1 would apply only for certain subwatersheds in Red River. With regard to the Red Pines project, it applies for the duration of the project. For other projects in the affected subwatersheds, it would apply until the Forest Plan is revised. The temporal scope of the soil amendment and water quality amendment 1 are therefore limited.

Response 4-8. Old growth.
Table III-85 and Table III-86 display how the Forest Plan minimum old growth requirements are met in Red River Watershed. Although you question if the project meets the Forest Plan direction for minimum Old Growth requirements, lacking any specifics, we are unable to address your concerns. If it is helpful, the project file contains a list of old growth stands to be allocated and their acreage.

Response 4-9. water quality, temporary road construction.
The limitations of NEZSED are discussed in Appendix H of the FEIS. Several field tests of the models are disclosed, which validate use of the modeling procedure, of which sediment routing is one component. Sediment routing is known to be one of the limitations of NEZSED. A specific discussion of sediment routing is found in Appendix H on pages H-23 through H-24.

New temporary roads are designed to minimize stream crossings and are designed to be primarily ridge-top roads that will have minimal direct impacts to streams with numerous design and mitigation measures (ROD, Appendix A). The location of the temporary roads has been reviewed on the ground also to minimize impacts.

Research, especially in lower gradient systems (which dominate much of the Red Pines project area), indicates that it may take several decades for sediment to be transported through the hydrological system. Neither the FEIS, nor its appendices, associated biological assessments, evaluations nor opinions, reveal the shortcomings with regards to NEZSED's consideration of sediment routing.

Response 4-10.NEZSED.
See Appendix – H of the FEIS for Limitations of the NEZSED model.
It is true that the NEZSED limitations discussion on pages H-5 and H-6 does not specifically address sediment routing. However, the NEZSED sediment yield results are used in the FISHSED model and the limitations of sediment routing are discussed on page H-22. In that discussion, limitations in the ability to model sediment movement from the slopes to the channel and transport down the channel are disclosed. These are NEZSED components of the NEZSED/FISHSED sediment modeling system employed in this project.

While the FEIS (Appendix H-24) briefly discusses the potential for long-term storage of sediment in low-gradient streams, this is not reflected in the upward trend determinations. How long will the sediment be stored there, what research has been conducted to evaluate the routing of sediment through these stretches~ and how have species responded to these impacts. Without an understanding of these interactions, the assumption that an upward trend will be attained is purely speculative.

Response 4-11.Upward trend.
The primary discussion of trend in aquatic conditions is found on in the FEIS pages H-24 through H-29. Substrate monitoring data was collected periodically during the period 1988 through 2002 at three stations in Red River. The results of these studies are described in the FEIS at Section 3.6.5.5 (mistakenly referenced as 3.6.6.5 on page H-25) and were used as a component in the trend analysis. Trends in sediment yield monitoring data during the period 1986 through 2001 were also described on page H-25 and used in the trend analysis. Thus, the trend analysis in part relies on field data collected within the Red River watershed during the period of 1986 through 2002. In addition to monitoring data, trends in sediment yield were modeled over time and professional judgment were applied to determined whether an upward trend in aquatic condition was expected over time. This determination in subject to uncertainty, as is any prediction.

The cumulative impacts of adjacent state, private and federal are not taken into account regarding steelhead, salmon or bull trout. Among the most important shortcomings is the lack of consideration of fisheries and habitat downstream from the project area. The Forest is at fault in light of their independent duty to not jeopardize the continued survival of Threatened and Endangered species under 16 USC 1536(a)(2).

The cumulative impacts of the various projects in the South Fork Clearwater River Sub-basin will lead to significant downstream effects, yet the Forest failed to address this critical issue.

Response 4-12. Cumulative impacts
The Nez Perce Forest has conducted an extensive cumulative effects analysis for the South Fork Clearwater River. This analysis is presented in the FEIS on starting on page 3-76. A more extensive description of the analysis and results is included in the Final Biological Assessment for TES fish species. The results of this analysis are summarized below for Alternative E.

An analysis of cumulative temperature effects to the South Fork Clearwater River has been completed as well. This analysis begins on page 3-81 of the FEIS.
Further, the FEIS (Appendix H-29) states that the Red Pines Project is expected to result in an upward trend in "many of the subwatersheds," and that Alternative E would result in an upward trend in the "greatest number of these areas." Yet the FEIS fails to disclose which watersheds will not meet the upward trend requirement, and how this complies with the Forest Plan requirements.

Natural (Base) Sediment Yield[2] (tons/year) of South Fork Clearwater River	**Existing Sediment Yield[1] (tons/year) South Fork Clearwater River**	**Existing Activity Yield[2] (tons/year) South Fork Clearwater River**	**Activity Yield for Red Pines Alternative E in 2005[3] (tons/year)**	**Red River Total Routed Yield w/ Alt. E[4] (tons/year)**	**Red Pines Alt. E (2005) Percent of SF Total Activity Yield[7]**	**Red Pines Percent of SF Existing Total Yield (2005)**
13,400	14,700	1,200	54	1,551	4.5	**0.37**

[1]Existing sediment yield includes the South Fork Clearwater base yield plus all modeled activity yield upstream of Mount Idaho bridge**, including** Whiskey-South, American-Crooked, and Meadow Face.
[2]Existing activity yield is simply the difference between the base yield and the existing yield.
[3]Activity yield by only includes yield generated by the modeled activities in Alternative E, routed to the Mount Idaho bridge.
[4]Red River Total Routed Yield includes Alternative E plus Whiskey-South and Upper Red River Restoration

An analysis of cumulative temperature effects to the South Fork Clearwater River has been completed as well. This analysis begins on page 3-81 of the FEIS.

It is unclear how the upward trend analysis is accurate, as opposed to an effort to downplay the impacts of the project. The FEIS (Appendix H-29) states that "Proposed"

1 Beechie, T. 2001. *Empirical Predictors of Annual Bed Load Travel Distance. and Implications for Salmonid Habitat Restoration and Protection.* Earth Surface Processes and Landfonns 26: 1025-1034.

restoration activities are those needed to achieve an upward trend, whereas "Discretionary" ones would provide for an improvement, but are not needed to achieve an upward trend. Given the fact that more of the restoration is "Proposed" (mandatory) in Alternative E than in any of the other alternatives, this would indicate that more work is needed to achieve an upward trend. Given the nearly 50% reduction in logging and temporary road construction in Alternative E vs. Alternative B, this is difficult to comprehend, and calls into question the accuracy of the upward trend analysis.

Unroaded Areas

With the current uncertainty surrounding the status of road less area management, we encourage you to avoid logging in any Unroaded areas. These areas provide many benefits to wildlife and forest health through their diversity of plant life, habitat security, and inaccessibility. Regardless of whether they were inventoried by the Forest Service during the Roadless Area Review Evaluations, they have value and should not be logged or roaded as part of this project. Especially within the Red River Drainage, where there is a lack of either inventoried or uninventoried roadless areas, it is especially important to conserve any remnant areas. This is especially true ofUnroaded Areas #3, 4 and 5, a 6,740 acre unroaded area complex that lies north and east of the Red River Ranger Station. Even Alternative E proposes to log and road these adjacent areas, reducing the potential for wildlife security. Given the importance of retaining core undeveloped areas in the drainage for the benefit of wildlife security as well as watershed health, the proposal to log and road these areas is especially problematic.

Response 4-13. Upward Trend.
Alternative E was designed to result in an upward trend in all Red River subwatersheds potentially affected by fuel treatment activities. Fuel treatment activities are not proposed in every subwatershed in Red River. Watershed restoration activities are not proposed in every subwatershed in Red River. Watershed restoration activities are, however, proposed in the same watersheds where fuel treatments would occur, and in some subwatersheds where fuel treatments are not proposed. This complies with upward trend direction in the Forest Plan. Proposed watershed restoration activities are summarized by subwatershed and presented in the Red Pines FEIS starting on page H-32.

Response 4-14. Improvements, Upward trend
Alternative E was designed such that improvement projects would produce an upward trend in all subwatersheds where fuel reduction activities are proposed. As disclosed in the FEIS, an upward trend could not be shown in some subwatersheds under Alternatives B, C, and D, thereby requiring a Forest Plan amendment to suspend upward trend requirements. This amendment does not apply to Alternative E because a through a combination of reduction of proposed fuel treatment and temporary road construction and maximizing restoration, an upward trend would be achieved in all subwatersheds affected by fuel treatment.

Response 4-15. Unroaded.
Comment acknowledged. This project has followed the current Forest Service policies related to Inventoried Roadless Areas and unroaded areas..

Goshawks

The Forest Service should leave a 30-acre buffer around active **and** previously existing but unoccupied nest sites as specified in the *Management Recommendations for the Northern Goshawk* (Reynolds 1992). Due to parasites or previous disturbances, goshawks often alternate between existing nests. These existing alternate nests may well be located within or adjacent to the proposed patch clearcuts and other units. The proposed action could remove or make these otherwise viable nests unusable.

Response 4-16. Goshawk
The following text was incorporated into the FEIS with the Red Pines Errata Sheet:

"Suitable goshawk habitat treated under each action alternative would not be considered suitable after treatment. FEIS Table III-88 displays goshawk habitat acres treated by alternative. Goshawks are known to alternate between existing nests. These existing alternate nests may be located within or adjacent to the proposed treatment units. The proposed actions under all action alternatives could remove or make these otherwise viable nests unusable. The number of acres treated under each alternative is one way of assessing the potential effects on unknown alternate nest sites between alternatives (see Table III-88). When considering the action alternatives, Alternative B has the greatest potential to affect goshawks, Alternative E has the least potential and Alternatives C and D are intermediate. Alternative A would have no effect on goshawk habitat. Under all action alternatives, Project Design Measures #7, #29, #35 and #37 and Mitigation Measure N aid in habitat protection and management of potential human disturbances." (ROD Appendix A).

Project Design Measure# 35 directs evaluation of all obvious stick nests to determine if the trees should be retained or if other management actions need to occur (ROD Appendix A). The Red Pines FEIS Errata Sheet incorporates retention of all goshawk nests into this design measure.

Mitigation Measure #N has been changed via the Red Pines Errata Sheet and states: **"Protect any active goshawk nests discovered within 450 feet of timber or fuels reduction activities, as well as a 30 acre no-treatment buffer area around the nest tree, as designated by the unit biologist to provide for foraging and nesting sites"** (ROD Appendix A, project file).